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May 4, 2011

*Via Electronic Filing*

Honorable Michael A. Shipp  
United States Magistrate Judge  
M.L. King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Walsh Securities, Inc. v. Cristo Property Management, Ltd., et al.**  
**Civil Action No.: 97-3496 (DRD/MAS)**

Dear Judge Shipp:

This firm represents Plaintiff Walsh Securities, Inc. ("Walsh Securities") in the above-referenced matter. Pursuant to Your Honor's April 26, 2011 Text Order, counsel are to submit a joint proposed scheduling order by May 6, 2011. We are e-filing this letter, in accordance with your Chamber's instructions, to request an extension. Counsel for Defendants Commonwealth Land Title Insurance Company ("Commonwealth"), Fidelity National Title Insurance Company of New York ("Fidelity"), Nations Title Insurance of New York, Inc. ("Nations") (collectively the "Title Insurance Defendants"), join in this request to extend the time to submit the joint proposed scheduling order until seven (7) days after Your Honor files an opinion and order disposing of the outstanding discovery disputes.

As Your Honor will recall, during the April 25, 2011 telephonic status conference, it was requested that the parties submit a joint proposed scheduling order seven (7) days after receiving an impending opinion and order addressing discovery issues involving witness statements obtained by Walsh Securities as part of an internal investigation and whether the Title Insurance Defendants can inquire into the terms of the settlement between Walsh Securities and certain settling defendants. These issues are relevant to the amount of time needed to complete discovery. Given that no order has yet issued and the May 6, 2011 deadline is approaching, for the foregoing reasons, Walsh Securities and the Title Insurance Defendants respectfully request that the Court amend its Text Order to indicate that the joint proposed scheduling order is due seven (7) days after entry of the Court's opinion and order on the discovery disputes.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

*Mashepp*  
So Ordered this 5<sup>th</sup> day  
of May, 2011  
s/  
Amy Walker Wagner